

RMBC - Equality Analysis Form for Commissioning, Decommissioning, Decision making, Projects, Policies, Services, Strategies or Functions (CDDPPSSF)

Under the Equality Act 2010 Protected characteristics are Age, Disability, Sex, Gender Reassignment, Race, Religion or Belief, Sexual Orientation, Civil Partnerships and Marriage, Pregnancy and Maternity. Page 6 of guidance. Other areas to note see guidance appendix 1

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| Name of policy, service or function. If a policy, list any associated policies: | Housing Allocation Policy |
| Name of service and Directorate | Housing Options, Adult Social Care, Housing and Public Health Directorate |
| Lead manager | Sandra Tolley, Head of Housing Options and Sandra Wardle Housing Advice and Assessment Manager |
| Date of Equality Analysis (EA) | 17 January 2019 |
| Names of those involved in the EA (Should include at least two other people) | Sandra Tolley, Head of Housing Options Sandra Wardle Housing Advice and Assessment Manager Carol Wordsworth, Housing register Coordinator Phil Syrat, Housing Options Information Coordinator Zaidah Ahmed, Corporate Equalities and Diversity Officer |

Aim/Scope (who the Policy /Service affects and intended outcomes if known) See page 7 of guidance step 1

The Council is required to allocate Social Housing according to a published Allocations Policy which has been drawn up according to the Housing Act 1996, Part VI and Part VII as amended by the Homelessness Act 2002, the Homelessness Reduction Act 2017 and the Localism Act 2011.

Rotherham Council's Housing Allocation Policy was last fully reviewed in February 2017. The policy outlines who can seek re-housing through the local authority, the properties they can apply for and how people are prioritised for available homes.

There are certain circumstances when the Allocation Policy needs to be adjusted. These include when there are legislative changes, if there are changes in supply and demand or when equality data informs the Council that should the Council need to change the way properties are allocated.

January 2019 – report to Cabinet proposing a further 5 changes, which aim to address some of these issues and will also help to prevent homelessness earlier, reduce waiting time for households with a medical need and apply consistent approaches within the policy for people who wish to move to a smaller home.

The five changes ensure compliance with the Homelessness Reduction Act which amends the Housing Act 1996 to make provision about measures for reducing homelessness.

The aim of the policy is to:

- Help people move quickly to alternative suitable housing

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- Ensure homeless households are given a high priority to move
- Make the Allocation Policy rules simpler to understand
- Support people from different backgrounds to move home
- Help vulnerable people sustain a tenancy
- Ensure people can afford a tenancy before they take it on

There are a number of reasons for the changes to the Allocation Policy:

- To ensure the policy applies equality and fairness throughout
- To support Rotherham's homelessness prevention work
- To be compliant with the Homelessness Reduction Act; ensuring a higher banding is given to those homeless households under the homeless prevention and relief duties.
- To ensure tenants wishing to downsize receive consistent choices.
- To ensure bungalows are offered to those people with an assessed need for a bungalow due to their health needs.
- To reduce the waiting time for the 1280 households who had been assessed for Band 2 status due to living in unsuitable housing due to a medical reason. The waiting time is extremely long, especially for ground floor accommodation.
- To reduce the waiting time for Council or Housing Association single tenants living in a flat who are expecting their first child wishing to move to family housing
- To ensure applicants who have been brought up by close relatives such as their grandparents or primary carers are given a local connection to Rotherham

The changes to the Allocation Policy in January 2017:

- As the new Homelessness Reduction Act is aimed to intervene at earlier stages to prevent homelessness the current banding related to homelessness households will be enhanced to award a higher banding but this would only be applicable following a full assessment. It is therefore proposed that:
- The downsizing policy will be amended to award Band 2 status to Council or Housing Association tenants who are under occupying their home to help them move to a property with at least 1 less bedroom (a ground floor flat or a bungalow will require a medical assessment)
- The quota of advertised properties will be amended in Band 2 from 50% to 60%, reduce the quota of advertised properties in Band 3 from 40% to 30%, and retain the 10% quota for Transfers
- The policy for single people who are Council or Housing Association tenants living in a flat who are expecting their first child will be amended so that they will be eligible for family accommodation on the production of the MATB1 form.
- The local connection rule will give a person a local connection if their close family relative or their Primary Carer has lived in Rotherham and have done so for the last 3 years.

A successful policy would see:

- Families having a stable home which give the best start in life for children, and vulnerable adults.

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- A reduction in the number of households on the housing register with a medical need to move
- A reducing in the time spent living in temporary accommodation
- A reduction in the usage of temporary accommodation by homeless households will therefore reduce expenditure
- Families with children prevented from becoming homeless
- An increase in the number of homeless households prevented from becoming homeless
- An increase in the number of homeless relief cases
- Households on low incomes being helped to affordable housing.
- Good quality, stable homes help people to avoid financial hardship and can have a significant impact on people's health and wellbeing
- People are happy with the waiting time to move home

The Allocation Policy impacts on all wards

What equality information is available? Include any engagement undertaken and identify any information gaps you are aware of. What monitoring arrangements have you made to monitor the impact of the policy or service on communities/groups according to their protected characteristics? See page 7 of guidance step 2

Key facts and statistics

- 263,400 people live in Rotherham Borough, about half living in and around the main urban area of Rotherham. The remainder live in smaller towns such as Wath, Dinnington and Maltby, and in numerous large villages and rural communities, all of which have their own distinct identities.
- 120,600 Rotherham residents are in employment whilst 106,000 people have workplaces in the Borough, giving a net outflow of 14,700 workers. One in five workers who live in Rotherham are employed in Sheffield and another one in five work elsewhere outside Rotherham.
- 45,259 children attend 117 Rotherham schools.
- One in four residents (25.2%) are aged 60 years or over and 22,500 people (8.5%) are aged 75 years or over. Rotherham has 56,900 children aged 0-17 (21.6% of the population).
- Rotherham's Black and minority ethnic (BME) population was 8.1% in 2011 and is now estimated at around 11%. The central area of Rotherham is far more ethnically diverse than the rest of the Borough. The largest minority ethnic group is Pakistani & Kashmiri (4% of the population), followed by the Slovak & Czech Roma (1.5% of the population). Rotherham also has smaller Black African, Indian, Chinese, Irish and Arab communities, all with between 500 and 2,000 people.
- The 2011 Census showed that 56,588 (22%) of Rotherham's population had a long term health problem or disability and 11.3% said their day-to-day activities were limited a lot by long term conditions (8.3% nationally). In November 2016, 30,306 Rotherham residents (11.6%) claimed Disability Living Allowance (16,680),

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Personal Independence Payment (6,100) or Attendance Allowance (7,516).

- One in six homes is rented from the council and although house prices have risen over the years, they are about half the national average.
- As at 1 August 2018 there are 6788 applicants on the housing register and the number of applicants in each band is:
 - Band 1 - households who require immediate housing and are considered for all vacant Council properties = 246
 - Band 2 - People who experience urgent housing need and require moving due to specific circumstances = 1,668
 - Band 3 - Applicants who are entitled to reasonable preference on a non-urgent basis = 1,783
 - Band 4 - Applicants who have no priority need = 1,755
 - Transfers – Council/Housing Association tenants = 1,336
- As at 1 August 2018 there are 1668 households on the housing register in Band 2 and have been assessed as:
 - Statutory Homeless = 19
 - Medical priority = 1,280
 - Statutory overcrowded = 19
 - Not ready for independent living held in suspension = 147
 - Leaving supported housing ready to live independently = 67
 - Requiring extra care housing = 5
 - Offender, not a high risk to the community = 4
 - Applicants living in private rented who cannot afford the rent, but are employed = 24
 - Victim of domestic violence = 96
 - Looked after child ready to live independently = 7
- In April 2018, the Homelessness team's case load was 132 cases, this increased to 321 on 31st August 2018 and 354 cases as at 30 September 2018.
- As at 1 August 2018, there are 577 households who are actually homeless or faced with homelessness on the housing register
- As at 1 August there are 1280 households who have been assessed for Band 2 status due to living in unsuitable housing due to a medical reason

The review of the Allocation Policy involved detailed consultation with a number of key stakeholders including the Council, Councillors, staff, partners, residents and voluntary groups.

The policy review took into account demographic information, supply and demand for properties. An assessment of waiting time to be rehoused was undertaken especially for those households with a medical need and for those who are homeless.

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| <p>Engagement undertaken with customers. (date and group(s) consulted and key findings) See page 7 of guidance step 3</p> | <p>The new Allocation Policy</p> <p>The changes to the Allocation Policy has been well received, with elected members at:</p> <p>1 November 2018 – Improving Places Select Commission. Elected Members supported all five recommendations, but also requested that primary carers are included in the local connection rules</p> <p>16 January 2019 - Elected Members supported all five recommendations but also requested that direct family members which includes grandparents be amended to close family relatives</p> <p>Members welcomed the changes as it will help residents who often contact them about rehousing issues at their local surgeries</p> <p>September 2018 - Other engagement/consultation has been undertaken at the Rotherham Show</p> <p>September 2018 - The Side by Side Partnership who are predominantly providers who work with homeless households have been consulted. They were supportive of the changes and the group highlighted further work will be required to prevent homelessness in the development of the Homelessness Prevention and Rough Sleeper Strategy 2019 - 2022</p> <p>October 2018 - Rotherfed who lead on Tenant Involvement have been consulted and also the Quality Challenge Group. Both groups were supportive of the changes especially for single parents who are tenants living in flats wanting to move to a house.</p> <p>December 2018 - Strategic Housing Partnership were consulted. A presentation was made highlighting the changes and the benefits for Rotherham people.</p> <p>Staff across both Children' and Adult Services have been provided with briefing papers relating to homeless households in Rotherham.</p> <p>The policy changes:</p> <p>a) Bring benefits for other directorates and partners, particularly in reducing homelessness for families with children and contributing to local targets on homelessness prevention and financial inclusion / capability.</p> |
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| | <p>b) Ensure that members, Council officers, partners and local people can be confident that changes to the policy will help local people access affordable housing quicker.</p> <p>Further actions required - In addition to implementing the amendments Cabinet will be provided with an update of progress in 12 months</p> |
| <p>Engagement undertaken with staff about the implications on service users (date and group(s) consulted and key findings) See page 7 of guidance step 3</p> | <p>New Allocation Policy</p> <p>The policy has been developed with support from Council Officers and input from the Strategic Leadership Team.</p> <p>Councillors, staff and partners play a vital role in the review of the Allocation Policy.</p> <p>Following approval the changes to the Allocations Policy will be effectively communicated to staff and members and training will be undertaken in-house by the Housing Advice and Assessment Manager</p> |
| The Analysis | |
| <p>How do you think the Policy/Service meets the needs of different communities and groups? Protected characteristics of Age, Disability, Sex, Gender Reassignment, Race, Religion or Belief, Sexual Orientation, Civil Partnerships and Marriage, Pregnancy and Maternity. Rotherham also includes Carers as a specific group. Other areas to note are Financial Inclusion, Fuel Poverty, and other social economic factors. This list is not exhaustive - see guidance appendix 1 and page 8 of guidance step 4</p> <p>The changes made to the Allocation Policy should have a positive impact on all communities. However the impact will need to be reviewed based on specific need.</p> <p>The changes should improve the Council's ability to respond to the demand for accommodation from homeless households and for those people with a medical need.</p> <p>Single people who are pregnant will be able to apply for family housing will be able to apply whilst they are pregnant as opposed to having to wait until their baby is born.</p> <p>By reducing the banding status from Band 1 to Band 2 for people who wish to downsize will reduce the volume of cases in Band 1. This will help those in Band 1 in urgent housing need move quicker and includes homeless people living in temporary accommodation, safeguarding cases and people waiting to be discharged from hospital move to a more suitable home quicker</p> | |
| <p>Analysis of the actual or likely effect of the Policy or Service: See page 8 of guidance step 4 and 5</p> <p>Does your Policy/Service present any problems or barriers to communities or</p> | |

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Group? Identify by protected characteristics **Does the Service/Policy provide any improvements/remove barriers?** Identify by protected characteristics

What affect will the Policy/Service have on community relations? Identify by protected characteristics

The Allocation Policy changes should remove barriers to Social Housing as the amendments will give more priority to people in urgent need. For example by increasing the quota of properties advertised in Band 2 from 50% to 60% will mean that people in need of urgent rehousing will be able to move more quickly away from unsuitable living conditions.

The changes will help homeless households with children move to more suitable housing quicker by awarding a higher Banding status, from Band 2 to the highest Band 1.

All new Council tenants are visited by their Area Housing Officer who provides information about the local area.

Vulnerable people are offered and provided with tenancy support which is tailored to individual needs to help them sustain their tenancy and live in the community.

The effect of changes of the policy will be closely monitored on areas such as:

- The number of households on the Housing Register
- The numbers of people prevented from becoming homeless
- An analysis of tenancy termination reasons
- The number of empty homes
- Void turnaround times
- Void Rent Loss
- Expenditure on temporary accommodation and hotels
- Ethnic origin and Nationality of households on the register
- The number of Council tenancy evictions

Please list any **actions and targets** by Protected Characteristic that need to be taken as a consequence of this assessment and ensure that they are added into your service plan.

Website Key Findings Summary: To meet legislative requirements a summary of the Equality Analysis needs to be completed and published.

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Equality Analysis Action Plan - See page 9 of guidance step 6 and 7

Time Period

Manager: Sandra Tolley, Head of Housing Options

Service Area: Housing Options, Adult Social Care Housing and Public Health Directorate Tel: 01709 255619

Title of Equality Analysis:

If the analysis is done at the right time, i.e. early before decisions are made, changes should be built in before the policy or change is signed off. This will remove the need for remedial actions. Where this is achieved, the only action required will be to monitor the impact of the policy/service/change on communities or groups according to their protected characteristic.

List all the Actions and Equality Targets identified

| Action/Target | State Protected Characteristics as listed below | Target date (MM/YY) |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|--------------------------------------------------|
| Monitor the number of households on the housing register in each Band including the protected characteristics | All | Annual on 31/3/2019 and 31/3/2020 |
| Consider homelessness statistics relating to the protected characteristics | All | Annual on 31/3/2019 and 31/3/2020 |
| Develop a Homelessness Prevention and Rough Sleeper Strategy which will support the delivery of the Allocation Policy (This strategy will include details of those to be consulted, to demonstrate that different people's views have been taken into consideration) | All | 31/3/2019 |
| Monitor the impact of the policy change by analysis the number of lettings in each Band according to their protected characteristic. | All | Annual on 31/3/2019 and 31/3/2020 |

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| Complete further EA's in the future should there be further changes to the policy | | All | |
| | | | |
| Name Of Director who approved Plan | Tom Bell, Assistant Director of Housing | Date | 18 January 2019 |

*A = Age, D= Disability, S = Sex, GR Gender Reassignment, RE= Race/ Ethnicity, RoB= Religion or Belief, SO= Sexual Orientation, PM= Pregnancy/Maternity, CPM = Civil Partnership or Marriage. C= Carers, O= other groups

Website Summary – Please complete for publishing on our website and append to any reports to Elected Members SLT or Directorate Management Teams

| Completed equality analysis | Key findings | Future actions |
|-----------------------------|--------------|----------------|
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| Completed equality analysis | Key findings | Future actions |
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| <p>Directorate: Adult Social Care Housing and Public Health Directorate</p> <p>Function, policy or proposal name: Allocation Policy</p> <p>Function or policy status: Changing (new, changing or existing)</p> <p>Name of lead officer completing the assessment:</p> <p>Sandra Tolley Sandra Wardle</p> <p>Date of assessment: 17 January 2019</p> | <p>The policy itself will not have a negative or adversely affect any communities or individuals.</p> <p>January 2019 – report to Cabinet proposing 5 changes, which aim to help to prevent homelessness earlier, reduce waiting time for households with a medical need and apply consistent approaches within the policy for people who wish to move to a smaller home.</p> <p>The five changes ensure compliance with the Homelessness Reduction Act which amends the Housing Act 1996 to make provision about measures for reducing homelessness.</p> <p>The changes make the Allocation Policy rules simpler to understand and improve access to accommodation for people who are on low incomes.</p> | <p>Any future policy changes will be subject to an EA's</p> <p>We will be monitoring the effect of the changes of the policy on areas such as:</p> <ul style="list-style-type: none"> • The number of households on the Housing Register • The numbers of people prevented from becoming homeless • An analysis of tenancy termination reasons • The number of empty homes • Void turnaround times • Void Rent Loss • Expenditure on temporary accommodation and hotels • Ethnic origin and Nationality of households on the register • The number of Council tenancy evictions |